

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,)
Plaintiff,) Civil Action No.
v.)
MOSHE HANANEL,)
Defendant.)

)

AMENDED REQUESTS FOR INTERNATIONAL JUDICIAL ASSISTANCE

On June 24, 2008, this Court granted Defendant Moshe Hananel's Motion for Letters Rogatory. Subsequently, Magistrate Judge Sorokin signed each Request for International Judicial Assistance (Dkt. #195). It has come to the Defendant's attention that the Hague Convention on Taking Evidence requires a specific form for letters rogatory, available at <http://hcch.e-vision.nl/upload/actform20e.pdf>. Accordingly, the Defendant submits the following Requests for International Judicial Assistance, with a signature line, using the Hague Conference on Private International Law's Model for Letters of Request.

Respectfully submitted,

MOSHE HANANEL,
By His Attorney,

/s/ Lawrence G. Green
Lawrence G. Green (MA Bar # 209060)
BURNS & LEVINSON LLP
125 Summer Street
Boston, MA 02110
617-345-3000

Dated: July 25, 2008

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 25, 2008.

/s/ Lawrence G. Green

*Model for Letters of Request recommended for use in applying the Hague Convention of
18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*

**Request for International Judicial Assistance pursuant to the Hague Convention of
18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters**

N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paragraphs may permit use of English, French or another language.

In order to avoid confusion, please spell out the name of the month in each date.

Please fill out an original and one copy of this form (use additional space if required).

1. Sender

United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

2. Central Authority of
the Requested State

The Israeli Central Authority
Directorate of Courts
19 Jaffa Road
Jerusalem

3. Person to whom the
executed request is
to be returned

Lawrence Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

4. Specification of the date by which the requesting authority requires receipt of the
response to the Letter of Request

Date

October 1, 2008

Reason for urgency*

* Omit if not applicable.

IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:

5. a Requesting judicial authority (Article 3,a))

United States District Court for the District of Massachusetts One Courthouse Way Boston, MA 02110
--

b To the competent authority of (Article 3, a))

Israeli Central Authority Directorate of Courts 19 Jaffa Road Jerusalem
--

c Names of the case and any identifying number

Sheldon G. Adelson v. Moshe Hananel C.A. No.: 04-cv-10357-RCL
--

6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3, b))

a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq. Duane Morris, LLP 470 Atlantic Avenue, Suite 500 Boston MA 02110
--

b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq. Burns & Levinson, LLP 125 Summer Street Boston, MA 02110

c Other parties

--

Representatives

--

* Omit if not applicable.

7.	a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract.
	b	Summary of complaint	Parties' employment agreement for investment options.
	c	Summary of defence and counterclaim*	
	d	Other necessary information or documents*	
8.	a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
	b	Purpose of the evidence or judicial act sought	
9.		Identity and address of any person to be examined (Article 3, e))*	Huggatt Elhadad 10 Maapo Street Tel Aviv Jaffa
10.		Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Huggatt Elhadad will be examined regarding Adelson's contracting with Hananel in Israel in 1995, material to jurisdiction, Hananel's work for Adelson from 1995, and supporting key terms of Hananel's employment, including finding investments for Adelson including casino investments in Israel and elsewhere outside the United States, and other matters.

* Omit if not applicable.

11. Documents or other property
to be inspected
(Article 3, *g*)*

12. Any requirement that the
evidence be given on oath
or affirmation and any
special form to be used
(Article 3, *h*)*

All deposition testimony is to be given under oath.

13. Special methods or procedure
to be followed (e.g. oral or
in writing, verbatim,
transcript or summary,
cross-examination, etc.)
(Articles 3, *i*) and 9)*

Defendant's counsel is to conduct the depositions.

14. Request for notification of
the time and place for the
execution of the Request
and identity and address of
any person to be notified
(Article 7)*

15. Request for attendance or
participation of judicial
personnel of the requesting
authority at the execution
of the Letter of Request
(Article 8)*

16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin (Article 11, b))*

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by*

DATE OF REQUEST

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C.A. No.: 04-cv-10357-RCL

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- a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

- b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

- c Other parties

Representatives

* Omit if not applicable.

7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract.
b	Summary of complaint	Parties' employment agreement for investment options.
c	Summary of defence and counterclaim*	
d	Other necessary information or documents*	
8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
b	Purpose of the evidence or judicial act sought	
9.	Identity and address of any person to be examined (Article 3, e))*	Majali Wahaba Deputy Minister of Foreign Affairs 153 Beit G'an
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Majali Wahaba will be examined regarding Hananel's work with Adelson on casino development and other matters.

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(Article 3, *g*)*

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12. Any requirement that the evidence be given on oath or affirmation and any special form to be used
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- a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

- b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

- c Other parties

Representatives

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7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract.
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8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
b	Purpose of the evidence or judicial act sought	
9.	Identity and address of any person to be examined (Article 3, e))*	Itach David 1130 Herzl Street Beith Shemesh
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Itach David will be examined regarding Hananel's work with Adelson (including before December, 1995).

* Omit if not applicable.

11. Documents or other property to be inspected
(Article 3, *g*)*

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12. Any requirement that the evidence be given on oath or affirmation and any special form to be used
(Article 3, *h*)*

All deposition testimony is to be given under oath.

13. Special methods or procedure to be followed (e.g. oral or in writing, verbatim, transcript or summary, cross-examination, etc.)
(Articles 3, *i*) and 9)*

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a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

c Other parties

Representatives

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c	Summary of defence and counterclaim*	
d	Other necessary information or documents*	
8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
b	Purpose of the evidence or judicial act sought	
9.	Identity and address of any person to be examined (Article 3, e))*	Oded Efrat 41 Zofit Street Zofit
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Oded Efrat will be examined regarding key terms of Hananel's employment, including finding investments for Adelson including casino investments in Israel and elsewhere outside the United States, and other matters.

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6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3, b))

- a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

- b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

- c Other parties

Representatives

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8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
b	Purpose of the evidence or judicial act sought	
9.	Identity and address of any person to be examined (Article 3, e))*	Lees Arieh 5 Keren Hayesod Street Ramat Hasharon
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f)*	Lees Arieh will be examined regarding Hananel's initiation of the Macau project and other matters.

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Federal Central Authority
Director, Legal Advisory Division
Department of External Affairs
125 Sussex Drive
Ottawa, Ontario
Canada
K1A 0G2

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- a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

- b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
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9.		Identity and address of any person to be examined (Article 3, e))*	Koubi Ariel 39-3228 Raleigh Street Port Coquitlam BCV3C3J5 Canada
10.		Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f)*	Koubi Ariel will be examined regarding Hananel's initiation of the Macau project and other matters.

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Sheldon G. Adelson v. Moshe Hananel
C.A. No.: 04-cv-10357-RCL

6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3, b))

- a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

- b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

- c Other parties

Representatives

* Omit if not applicable.

7.	a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract.
	b	Summary of complaint	Parties' employment agreement for investment options.
	c	Summary of defence and counterclaim*	
	d	Other necessary information or documents*	
8.	a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
	b	Purpose of the evidence or judicial act sought	
9.		Identity and address of any person to be examined (Article 3, e))*	Dan Tichon 5 Hanamer Street Jerusalem
10.		Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Dan Tichon will be examined regarding his knowledge of Adelson's involvement in casino projects and Hananel's work with Adelson on casino development and investments and other matters.

* Omit if not applicable.

11. Documents or other property
to be inspected
(Article 3, g)*

11. Documents or other property to be inspected (Article 3, g)*

12. Any requirement that the
evidence be given on oath
or affirmation and any
special form to be used
(Article 3, h)*

All deposition testimony is to be given under oath.
--

13. Special methods or procedure
to be followed (e.g. oral or
in writing, verbatim,
transcript or summary,
cross-examination, etc.)
(Articles 3, i) and 9)*

Defendant's counsel is to conduct the depositions.

14. Request for notification of
the time and place for the
execution of the Request
and identity and address of
any person to be notified
(Article 7)*

Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Article 7)*

15. Request for attendance or
participation of judicial
personnel of the requesting
authority at the execution
of the Letter of Request
(Article 8)*

Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (Article 8)*

16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin (Article 11, b))*

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by*

DATE OF REQUEST

July 25, 2008

SIGNATURE AND SEAL OF THE
REQUESTING AUTHORITY



*Model for Letters of Request recommended for use in applying the Hague Convention of
18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*

**Request for International Judicial Assistance pursuant to the Hague Convention of
18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters**

N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paragraphs may permit use of English, French or another language.

In order to avoid confusion, please spell out the name of the month in each date.

Please fill out an original and one copy of this form (use additional space if required).

1. Sender

United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

2. Central Authority of
the Requested State

The Israeli Central Authority
Directorate of Courts
19 Jaffa Road
Jerusalem

3. Person to whom the
executed request is
to be returned

Lawrence Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

4. Specification of the date by which the requesting authority requires receipt of the
response to the Letter of Request

Date

October 1, 2008

Reason for urgency*

* Omit if not applicable.

IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:

5. a Requesting judicial authority (Article 3,a))

United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

- b To the competent authority of (Article 3, a))

Israeli Central Authority
Directorate of Courts
19 Jaffa Road
Jerusalem

- c Names of the case and any identifying number

Sheldon G. Adelson v. Moshe Hananel
C.A. No.: 04-cv-10357-RCL

6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3, b))

- a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

- b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

- c Other parties

Representatives

* Omit if not applicable.

7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract.
b	Summary of complaint	Parties' employment agreement for investment options.
c	Summary of defence and counterclaim*	
d	Other necessary information or documents*	
8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
b	Purpose of the evidence or judicial act sought	
9.	Identity and address of any person to be examined (Article 3, e))*	Avi Hefetz 22 Kanfey Nesharim Street Jerusalem
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Avi Hefetz will be examined regarding his work for Adelson on investment projects during the relevant period, including the Africa Israel potential investment and the Eilat casino project, all material to proof of Hananel's work with Adelson on casino development and other matters.

* Omit if not applicable.

11. Documents or other property to be inspected
(Article 3, g)*

11. Documents or other property to be inspected (Article 3, g)*
--

12. Any requirement that the evidence be given on oath or affirmation and any special form to be used
(Article 3, h)*

All deposition testimony is to be given under oath.

13. Special methods or procedure to be followed (e.g. oral or in writing, verbatim, transcript or summary, cross-examination, etc.)
(Articles 3, i) and 9)*

Defendant's counsel is to conduct the depositions.
--

14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified
(Article 7)*

Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Article 7)*

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(Article 8)*

Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (Article 8)*

* Omit if not applicable.

16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin (Article 11, b))*

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by*

DATE OF REQUEST

July 25, 2008

SIGNATURE AND SEAL OF THE
REQUESTING AUTHORITY

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18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*

**Request for International Judicial Assistance pursuant to the Hague Convention of
18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters**

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In order to avoid confusion, please spell out the name of the month in each date.

Please fill out an original and one copy of this form (use additional space if required).

1. Sender

United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

2. Central Authority of
the Requested State

Master of the High Court
Dublin, Ireland

3. Person to whom the
executed request is
to be returned

Lawrence Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

4. Specification of the date by which the requesting authority requires receipt of the
response to the Letter of Request

Date

October 1, 2008

Reason for urgency*

* Omit if not applicable.

IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:

5. a Requesting judicial authority (Article 3,a))

United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

- b To the competent authority of (Article 3, a))

Master of the High Court
Dublin, Ireland

- c Names of the case and any identifying number

Sheldon G. Adelson v. Moshe Hananel
C.A. No.: 04-cv-10357-RCL

6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3, b))

- a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

- b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

- c Other parties

Representatives

* Omit if not applicable.

7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract
b	Summary of complaint	Parties' employment agreement for investment options
c	Summary of defence and counterclaim*	
d	Other necessary information or documents*	
8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
b	Purpose of the evidence or judicial act sought	
9.	Identity and address of any person to be examined (Article 3, e))*	Dermod Dwyer Dublin, Ireland
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Dermod Dwyer will be examined regarding his knowledge of Hananel's work with Adelson on casino development and other matters.

* Omit if not applicable.

11. Documents or other property
to be inspected
(Article 3, *g*)*

11. Documents or other property to be inspected (Article 3, <i>g</i>)*

12. Any requirement that the
evidence be given on oath
or affirmation and any
special form to be used
(Article 3, *h*)*

All deposition testimony is to be given under oath.
--

13. Special methods or procedure
to be followed (e.g. oral or
in writing, verbatim,
transcript or summary,
cross-examination, etc.)
(Articles 3, *i*) and 9)*

Defendant's counsel is to conduct the depositions.

14. Request for notification of
the time and place for the
execution of the Request
and identity and address of
any person to be notified
(Article 7)*

14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Article 7)*

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personnel of the requesting
authority at the execution
of the Letter of Request
(Article 8)*

15. Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (Article 8)*

16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin (Article 11, b))*

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DATE OF REQUEST

July 25, 2008

SIGNATURE AND SEAL OF THE REQUESTING AUTHORITY

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18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*

**Request for International Judicial Assistance pursuant to the Hague Convention of
18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters**

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1. Sender

United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

2. Central Authority of
the Requested State

Bureau of International Judicial Assistance
Ministry of Justice of the People's Republic of China
10 Chaoyangmen Nandajie
Chaoyang District
Beijing 100020

3. Person to whom the
executed request is
to be returned

Lawrence Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

4. Specification of the date by which the requesting authority requires receipt of the
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Date

October 1, 2008

Reason for urgency*

* Omit if not applicable.

IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:

5. a Requesting judicial authority (Article 3,a))

United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

- b To the competent authority of (Article 3, a))

Bureau of International Judicial Assistance
Ministry of Justice of the People's Republic of China
10 Chaoyangman Nandajie
Chaoyang District
Beijing 100020

- c Names of the case and any identifying number

Sheldon G. Adelson v. Moshe Hananel
C.A. No.: 04-cv-10357-RCL

6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3, b))

- a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

- b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

- c Other parties

Representatives

* Omit if not applicable.

7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract
b	Summary of complaint	Parties' employment agreement for investment options
c	Summary of defence and counterclaim*	
d	Other necessary information or documents*	
8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
b	Purpose of the evidence or judicial act sought	
9.	Identity and address of any person to be examined (Article 3, e))*	Kittie Chan Avenida Da Praia Grande No. 75-81 2nd Andar Eel "Veng Fa" Macau, China
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f)*	Kittie Chan will be examined regarding conversations and meetings with Mr. Adelson and/or his employees or representatives, including in Macau, concerning the Macau project, during the relevant period.

* Omit if not applicable.

11. Documents or other property
to be inspected
(Article 3, *g*)*

11. Documents or other property to be inspected (Article 3, <i>g</i>)*

12. Any requirement that the
evidence be given on oath
or affirmation and any
special form to be used
(Article 3, *h*)*

All deposition testimony is to be given under oath.
--

13. Special methods or procedure
to be followed (e.g. oral or
in writing, verbatim,
transcript or summary,
cross-examination, etc.)
(Articles 3, *i*) and 9)*

Defendant's counsel is to conduct the depositions.

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the time and place for the
execution of the Request
and identity and address of
any person to be notified
(Article 7)*

14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Article 7)*

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participation of judicial
personnel of the requesting
authority at the execution
of the Letter of Request
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15. Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (Article 8)*

16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin (Article 11, b))*

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by*

DATE OF REQUEST

July 25, 2008

SIGNATURE AND SEAL OF THE
REQUESTING AUTHORITY

Model for Letters of Request recommended for use in applying the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters

Request for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters

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1. Sender

United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

2. Central Authority of the Requested State

The Israeli Central Authority
Directorate of Courts
19 Jaffa Road
Jerusalem

3. Person to whom the executed request is to be returned

Lawrence Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

4. Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request

Date

October 1, 2008

Reason for urgency*

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* Omit if not applicable.

IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:

5. a Requesting judicial authority (Article 3,a))

United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

- b To the competent authority of (Article 3, a))

Israeli Central Authority
Directorate of Courts
19 Jaffa Road
Jerusalem

- c Names of the case and any identifying number

Sheldon G. Adelson v. Moshe Hananel
C.A. No.: 04-cv-10357-RCL

6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3, b))

- a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

- b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

- c Other parties

Representatives

* Omit if not applicable.

7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract.
b	Summary of complaint	Parties' employment agreement for investment options.
c	Summary of defence and counterclaim*	
d	Other necessary information or documents*	
8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
b	Purpose of the evidence or judicial act sought	
9.	Identity and address of any person to be examined (Article 3, e))*	Melnick Moshe 28 Bareket Street Ramat Efal
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Melnick Moshe will be examined regarding his knowledge of Adelson investments in Israel and Hananel's role and work for Adelson and other matters.

* Omit if not applicable.

11. Documents or other property
to be inspected
(Article 3, *g*)*

--

12. Any requirement that the
evidence be given on oath
or affirmation and any
special form to be used
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to be followed (e.g. oral or
in writing, verbatim,
transcript or summary,
cross-examination, etc.)
(Articles 3, *i*) and 9)*

Defendant's counsel is to conduct the depositions.
--

14. Request for notification of
the time and place for the
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(Article 7)*

--

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personnel of the requesting
authority at the execution
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16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin
(Article 11, b))*

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DATE OF REQUEST

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*Model for Letters of Request recommended for use in applying the Hague Convention of
18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*

**Request for International Judicial Assistance pursuant to the Hague Convention of
18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters**

N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paragraphs may permit use of English, French or another language.

In order to avoid confusion, please spell out the name of the month in each date.

Please fill out an original and one copy of this form (use additional space if required).

1. Sender

United States District Court for the District of
Massachusetts
One Courthouse Way
Boston, MA 02110

2. Central Authority of
the Requested State

Hong Kong SAR
Chief Secretary of Hong Kong
Central Government Offices
Laver Albert Road
Hong Kong

3. Person to whom the
executed request is
to be returned

Lawrence Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

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Date

October 1, 2008

Reason for urgency*

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United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

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Hong Kong SAR
Chief Secretary of Hong Kong
Central Government Offices
Laver Albert Road
Hong Kong

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Sheldon G. Adelson v. Moshe Hananel
C.A. No.: 04-cv-10357-RCL

6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3, b))

a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

c Other parties

Representatives

* Omit if not applicable.

7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract
b	Summary of complaint	Parties' employment agreement for investment options
c	Summary of defence and counterclaim*	
d	Other necessary information or documents*	
8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
b	Purpose of the evidence or judicial act sought	
9.	Identity and address of any person to be examined (Article 3, e))*	Richard Suen c/o John A. O'Malley, Esq. Fulbright & Jaworski LLP 555 South Flower Street 41st Floor Los Angeles, CA 90071
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Richard Suen will be examined regarding extensive dealings with Adelson confirming Adelson's early interest in Macau, as initiated by Hananel, and other matters.

* Omit if not applicable.

11. Documents or other property
to be inspected
(Article 3, *g*)*

11. Documents or other property to be inspected (Article 3, <i>g</i>)*

12. Any requirement that the
evidence be given on oath
or affirmation and any
special form to be used
(Article 3, *h*)*

All deposition testimony is to be given under oath.
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13. Special methods or procedure
to be followed (e.g. oral or
in writing, verbatim,
transcript or summary,
cross-examination, etc.)
(Articles 3, *i*) and 9)*

Defendant's counsel is to conduct the depositions.

14. Request for notification of
the time and place for the
execution of the Request
and identity and address of
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14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Article 7)*

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authority at the execution
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15. Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (Article 8)*

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(Article 11, b))*

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by*

DATE OF REQUEST

July 25, 2008

SIGNATURE AND SEAL OF THE REQUESTING AUTHORITY

[Erase all entries](#)

[Print](#)